UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

ALFREDO LOPEZ and JULIO	§	
HUESCA; Individually and on behalf of	§	
all others similarly situated,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. 3:16-cv-02595-D
	§	
RELIABLE CLEAN-UP AND	§	
SUPPORT SERVICES, LLC,	§	
RELIABLE BROTHERS	§	
CONSTRUCTION, LLC, DANIEL	§	
SANTOS, and LUCIANO SANTOS,	§	
	§	
Defendants,	§	

DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Defendants Reliable Clean-up and Support Services, LLC, Reliable Brothers Construction, LLC, Daniel Santos, and Luciano Santos (collectively "Defendants"), and pursuant to Federal Rule of Civil procedure 6(b), hereby move to extend the deadline to respond to Plaintiffs' Motion for Attorney's Fees (Doc # 102), and would respectfully show unto this Court the following:

I.

- The undersigned needs additional time to further examine, analyze and study
 Plaintiffs' Motion and the extensive data included in its exhibits, and thus be able to draft and file a complete and accurate response to same.
- 2. The undersigned currently faces the challenging and demanding task to closely

- review in detail over 530 entries off the extensive attorney's timesheet, provided by Plaintiffs as part of their Motion's exhibits. The analysis of said timesheet entries is still on-going as of today.
- 3. Also, to date Defendants have not been able to decide and narrow down on an attorney's fees expert to scrutinize and dissect Plaintiffs' attorney's fees, rates, etc. Respectable experts in the required area with good credentials and strong backgrounds are difficult to find.
- 4. In addition, the undersigned is currently on a family trip with his son who is on Spring break, for the latter attends a private school whose break started on April 15, 2019, during Holy week, for two weeks.
- 5. Therefore, as shown above, Defendants need additional time to draft and file a complete and accurate response to Plaintiffs' Motion for Attorney's fees.

II.

- 1. Plaintiffs filed their Motion for Attorney's fees on April 4, 2019. (Doc # 102).
- 2. Defendants' response is currently due Thursday, April 25, 2019.
- 3. Thus, Defendants respectfully ask the Court to extend their time to respond 30 days from today's date, to Friday, May 24, 2019.
- 4. The undersigned communicated with Plaintiffs' Counsel Aaron Johnson via both text message and telephonically on April 23, 2019, in the afternoon, explaining and discussing the above mentioned reasons for Defendants' request for additional time to respond.
- 5. Plaintiffs' Counsel has stated that he was "ok" with Defendants' extension of time

to respond until May 24, 2019, and that he did not oppose this Defendants' Motion to extend time.

6. This Motion is filed not so to cause undue delay, but so that justice may be done.

III.

WHEREFORE, Defendants respectfully request the Court that the stated request to extend the time to respond to Plaintiffs' Motion for Attorneys' fees to May 24, 2019, be granted herein.

Most Respectfully Submitted, ARMANDO P. DURAN, PLLC

By: /s/ Armando P. Duran
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ATTORNEY FOR DEFENDANTS,

CERTIFICATE OF CONFERENCE

I, the undersigned Counsel, hereby certify that on the 23rd day of April, 2019, I have consulted with Plaintiffs' Counsel Mr. Aaron Johnson, Esq., via both text message and telephonically, on whether or not he opposed Defendants' request to extend the time to respond to Plaintiffs' Motion and whether or not he opposed this Motion. Mr. Johnson has stated that he is ok with the new deadline to respond of May 24, 2019, and that he does not oppose this Motion.

/s/ Armando P. Duran Armando P. Duran

CERTIFICATE OF SERVICE

I, the undersigned Counsel, hereby certify that on this 24th day of April, 2019, I have forwarded a copy of the foregoing document to Plaintiffs' Counsel and to all Counsel of record, as prescribed by law.

/s/ Armando P. Duran Armando P. Duran